

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**In re: Federal Mogul Global, Inc., *et al.*, (Bankruptcy # 01-10578)(RTL)**

## Debtors.

**THE OFFICIAL COMMITTEE OF  
ASBESTOS CLAIMANTS and  
ERIC D. GREEN, as the  
LEGAL REPRESENTATIVE FOR  
FUTURE ASBESTOS CLAIMANTS,**

**Plaintiffs,**

**V.**

**Civil Action No. 05-59 JHR**

**ASBESTOS PROPERTY  
DAMAGE COMMITTEE,**

**Defendant.**

**PLAINTIFFS' COUNTER-DESIGNATIONS OF AND OBJECTIONS TO DEPOSITION**  
**TESTIMONY DESIGNATED BY THE DEFENDANT**

Pursuant to this Court’s Case Management Order dated March 30, 2005 and the subsequent agreement of the parties to the date by which they would exchange designations of deposition testimony, the Official Committee of Asbestos Claimants (the “ACC”) and Eric D. Green, the duly appointed legal representative for future asbestos personal injury claimants (the “Futures Representative,” together with the ACC, the “Plaintiffs”) hereby make the following counter-designations of and objections to the deposition testimony designated by Defendant Asbestos Property Damage Committee:

**William Hanlon**  
**Taken in In re Federal Mogul, et al.**  
**June 1, 2005**

Plaintiffs have no objections to the testimony designated by Defendant other than the form of question objections already noted on the transcript and do not counter-designate any additional testimony other than their own designations of Mr. Hanlon's deposition testimony which were served on the Defendant on June 8, 2005.

**George Michael Lynch**  
**Taken in In re Federal Mogul, et al.**  
**May 25, 2005**

Plaintiffs have the following objections to the testimony designated by the Defendant:

Objection to testimony designated from Page 47:2 through Page 49:16 and testimony designated from pages 50 through 52:

Objection: Relevance; Lack of Foundation. Testimony about Federal Mogul's obligations to a hypothetical trust fund set up and administered by the United States government to pay asbestos personal injury claims pursuant to federal asbestos reform legislation (the so-called "FAIR Act") as compared to its treatment under a proposed plan of reorganization in this bankruptcy case is not relevant to the magnitude of Turner & Newall's asbestos liabilities under existing law at the time it filed for bankruptcy protection.

Objection to testimony designated from page 65 through page 84 line 13:

Objection: Relevance; Lack of Foundation.

Plaintiffs hereby counter-designate the following deposition testimony from Mr. Lynch's deposition:

Page 15 lines 1 through 5

Page 20 lines 11 through 14

Page 27 line 25 through Page 28 line 2

Page 30 lines 3 through 7

Page 85 line 14 through Page 86 line 2

Page 96 line 2 through Page 97 line 19

Page 98 line 18 through Page 99 line 10

Page 99 line 15 through Page 101 line 22

Page 107 line 5 through Page 108 line 13

The parties will submit to the Court a complete copy of each deposition which has been designated showing the portions designated by the Plaintiffs in one color (blue) and the portions designated by Defendants in a different color (green). A copy of any exhibit which will be offered through the testimony of a deponent witness will also be supplied to the Court at the time the deposition testimony is offered.

Dated: Wilmington, Delaware  
June 10, 2005

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